

EXHIBIT 1

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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 LIBERTY MEDIA HOLDINGS, LLC)

Case No. 12-cv-00923-LRH-GWF

11 Plaintiff,)

12 vs.)

**REQUESTS FOR PRODUCTION TO
DEFENDANT LETYAGIN D/B/A
SUNPORNO.COM, NOS. 1-18**

13 SERGEJ LETYAGIN d/b/a)
 14 SUNPORNO.COM, IDEAL CONSULT,)
 15 LTD., "ADVERT", "CASTA",)
 16 "TRIKSTER", "WORKER", "LIKIS",)
 "TESTER" and DOES 1-50)

17 Defendants)

18
 19 Pursuant to Fed. R. Civ. P 26 and 34, and pursuant to this Court's Order of _____,
 20 2012 (ECF ____), Plaintiff requests that Defendant provide the requested documents and things
 21 for copying or inspection within 30 days of service of these requests:

22 **Instructions and Definitions**

23 The following instructions and definitions apply to each request:

24 1. "Document" means documents or electronically stored information as defined by
 25 Rule 34, Federal Rules of Civil Procedure.

26 2. Any reference to "SunPorno," "Defendant," "You," or "Your" means Defendant
 27 Sergej Letyagin d/b/a SunPorno.com, any company Defendant owns an interest in, and the
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1 officers, attorneys, agents representatives, employees, assigns, or other person acting on behalf
2 of Defendant.

3 3. "Person" means any natural person or any other legal entity. Any reference to
4 any natural person or other legal entity. Any reference to any person, entity, or corporation
5 includes that person's parent corporation, subsidiaries, affiliates, predecessors, directors, officers,
6 employees, agents, attorneys, assigns, alter egos, and any other person or entity acting on behalf
7 of said person.

8 4. "Related to" or "relating to" or "reference" shall mean directly or indirectly
9 mentioning or describing, pertaining to, being connected with, or reflecting upon a stated subject
10 matter.

11 5. The singular form of a word should be interpreted as plural and the plural as
12 singular as necessary to bring within the scope of any request which otherwise would not be
13 construed to be within the scope of the request.

14 6. Defendant shall reasonably and naturally interpret all requests for production
15 recognizing that Defendant may not have specific knowledge of the documents and things
16 sought. When in doubt about the meaning of a request, the request should be given a reasonable
17 interpretation (which may be specified in the response) and the corresponding response should
18 be done or drafted in a manner that is designed to provide, rather than deny, information.
19 Defendant is also reminded that evasive or incomplete disclosures, answers, or responses may be
20 sanctionable under the provisions of Rule 37, Federal Rules of Civil Procedure.

21 7. Upon receiving a document request, Defendant should take reasonable steps to
22 ensure that it (i) understands what documents are requested, (ii) has adopted a reasonable plan to
23 obtain documents in a timely and reasonable manner, and (iii) is purposefully implementing that
24 plan in good faith.

25 8. If the scope of the document production is narrowed by one or more objections,
26 this fact and the nature of the documents withheld shall be asserted explicitly. In making an
27 objection, Defendant is reminded that discovery objections must be based on a good-faith belief
28

1 in the merits of the objection and that the objection must not be made solely for the purpose of
 2 withholding or delaying the disclosure of relevant information.

3 9. If Defendant objects to a request as overbroad when a narrower version of the
 4 request would not be objectionable, the documents responsive to the narrower version shall be
 5 produced without waiting for a resolution of the dispute over the scope of the request. Further, if
 6 production is limited by an objection, Defendant shall clearly describe the limitation in its
 7 response.

8 9 Requests for Production

10 RFP No. 1:

11 Provide any and all information sufficient to identify SunPorno.com user advert, including but
 12 not limited to Defendant's true name, addresses, e-mail addresses, I.P. addresses, and the dates
 13 and times of logins to SunPorno.com, and copies of any emails to or from advert in your
 14 possession.

15 Answer:

18 RFP No. 2:

19 Provide documentation sufficient to determine the number of counts of copyright infringement
 20 committed by advert, including a log or other record of all of videos uploaded by advert.

21 Answer:

24 RFP No. 3:

25 Provide copies of all DMCA notices, other takedown requests, or other notices of copyright
 26 infringement sent to you pertaining to videos uploaded by advert.

27 Answer:

RFP No. 4

Provide any and all information sufficient to identify SunPorno.com user Casta, including but not limited to Defendant's true name, addresses, e-mail addresses, I.P. addresses, and the dates and times of logins to SunPorno.com, and copies of any emails to or from Casta in your possession.

Answer:

RFP No. 5:

Provide documentation sufficient to determine the number of counts of copyright infringement committed by Casta, including a log or other record of all of videos uploaded by Casta.

Answer:

RFP No. 6:

Provide copies of all DMCA notices, other takedown requests, or other notices of copyright infringement sent to you pertaining to videos uploaded by Casta.

Answer

RFP No. 7

Provide any and all information sufficient to identify SunPorno.com user Trikster, including but not limited to Defendant's true name, addresses, e-mail addresses, I.P. addresses, and the dates and times of logins to SunPorno.com, and copies of any emails to or from Trikster in your possession.

1 Answer:

4 **RFP No. 8:**

5 Provide documentation sufficient to determine the number of counts of copyright infringement
6 committed by Trikster, including a log or other record of all of videos uploaded by Trikster.

7 Answer:

10 **RFP No. 9**

11 Provide copies of all DMCA notices, other takedown requests, or other notices of copyright
12 infringement sent to you pertaining to videos uploaded by Trikster.

13 Answer

16 **RFP No. 10:**

17 Provide any and all information sufficient to identify SunPorno.com user worker, including but
18 not limited to Defendant's true name, addresses, e-mail addresses, I.P. addresses, and the dates
19 and times of logins to SunPorno.com, and copies of any emails to or from worker in your
20 possession.

21 Answer:

24 **RFP No. 11:**

25 Provide documentation sufficient to determine the number of counts of copyright infringement
26 committed by worker, including a log or other record of all of videos uploaded by worker.

27 Answer:

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2 **RFP No. 12:**

3 Provide copies of all DMCA notices, other takedown requests, or other notices of copyright
4 infringement sent to you pertaining to videos uploaded by worker.

5 **Answer:**
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8 **RFP No. 13:**

9 Provide any and all information sufficient to identify SunPorno.com user likis, including but not
10 limited to Defendant's true name, addresses, e-mail addresses, I.P. addresses, and the dates and
11 times of logins to SunPorno.com, and copies of any emails to or from likis in your possession.

12 **Answer:**
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15 **RFP No. 14:**

16 Provide documentation sufficient to determine the number of counts of copyright infringement
17 committed by likis, including a log or other record of all of videos uploaded by likis.

18 **Answer:**
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21 **RFP No. 15:**

22 Provide copies of all DMCA notices, other takedown requests, or other notices of copyright
23 infringement sent to you pertaining to videos uploaded by likis.

24 **Answer:**
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1 **RFP No. 16:**

2 Provide any and all information sufficient to identify SunPorno.com user tester, including but not
3 limited to Defendant's true name, addresses, e-mail addresses, I.P. addresses, and the dates and
4 times of logins to SunPorno.com, and copies of any emails to or from tester in your possession.

5 **Answer:**
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8 **RFP No. 17:**

9 Provide documentation sufficient to determine the number of counts of copyright infringement
10 committed by tester, including a log or other record of all of videos uploaded by tester.

11 **Answer:**
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14 **RFP No. 18:**

15 Provide copies of all DMCA notices, other takedown requests, or other notices of copyright
16 infringement sent to you pertaining to videos uploaded by tester.

17 **Answer:**
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21 Dated: June 18, 2012

Respectfully Submitted,

s/Marc J. Randazza

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